


From: Russell Greer russmark@gmail.com 
Subject: Re: Invitation to Meet & Confer
Date: January 13, 2025 at 2:32 AM
To: Matthew Hardin matthewdhardin@gmail.com

RG

Sir,

The amended production will be provided Monday by 11:59 PM PST.

I do have the initial disclosure list here attached. Just trying to put all of the documents in the same document. Attached at least the description list. Will send the final document with all documents by tomorrow at 11:59 PM.

As for debtor's motion: it is governed by FRCP 69. I believe I sent you an email last week saying I could amend that motion with updated rules.

Initial disclosure .pdf



Sent from my iPhone

On Jan 6, 2025, at 1:00 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

This will confirm our meet and confer from approximately 3:10 to 3:30 this afternoon. Without waiving any of our rights or yours, it was agreed as follows:

- 1) You intend to provide a supplemental/amended response to our request for production of documents by January 13, 2025.
- 2) You also intend to amend your initial disclosures to provide a "list" of all documents by January 13, 2025.
- 3) Your position is that the request for a debtor's examination is not governed by Rule 37-1 and does not seek discovery. You indicated you will notify us by January 13, 2025 what rule you believe governs that motion.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

On Jan 6, 2025, at 3:05 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Mr. Moon and I are awaiting this meet and confer. Please let me know if you are having technological difficulties or if you will be joining us shortly.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

On Jan 6, 2025, at 2:01 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Mr. Greer,

Per our discussions, I have scheduled a virtual meet and confer with you at 3 pm Eastern Time. Zoom may have sent you this invitation already, but I am copying and pasting it below just in case you have not already received it:

Matthew Hardin is inviting you to a scheduled Zoom meeting.

Topic: Meet and Confer (Russell Greer)

Time: Jan 6, 2025 03:00 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://us06web.zoom.us/j/87493653415?pwd=0G5IzlaKMrhncKDRVGM0vi5tBmhxFD.1>

Meeting ID: 874 9365 3415
Passcode: 627203

Find your local number: <https://us06web.zoom.us/j/kcuZuwpaR2>

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

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